

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE RESCAP LIQUIDATING TRUST
MORTGAGE PURCHASE LITIGATION

Case No. 12-12020 (MG) (Ch. 11)
Adv. Proc. No. 14-07900 (MG)

This document relates to:

Residential Funding Co. v. HSBC Mortg.
Corp. (USA), Adv. Proc. No. 14-01915 (MG)

Residential Funding Co. v. UBS Real Estate
Secs., Inc., Adv. Proc. No. 14-01926 (MG)

ResCap Liquidating Trust v. Summit Fin.
Mortg. LLC, Adv. Proc. No. 14-01996 (MG)

ResCap Liquidating Trust v. Mortg. Investors
Grp., Inc., Adv. Proc. No. 14-02004 (MG)

Residential Funding Co. v. SunTrust Mortg.
Inc., Adv. Proc. No. 13-1820 (MG)

**NOTICE OF DEFENDANTS' MOTION TO
MODIFY ORDER APPOINTING
MEDIATOR**

PLEASE TAKE NOTICE that, in the above-captioned adversary proceedings (the “Adversary Proceedings”); the Memorandum of Law In Support of Defendants’ Motion to Modify Order Appointing Mediator; and the Declaration of Krista Anderson and exhibits attached thereto, each of the defendants (collectively, the “Defendants”) in the Adversary Proceedings, by and through their undersigned counsel, will move this Court on July 30, 2015, before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, for an Order modifying the Order Appointing Mediator to permit Defendants to take discovery of the mediation communications between the adverse Chapter 11 parties regarding the Global Settlement and requiring Plaintiff to produce settlement communications between the adverse Chapter 11 parties, including communications pre-dating the Mediation Order.

Dated: June 3, 2015

Respectfully submitted,

/s/ R. Hackney Wiegmann

R. Hackney Wiegmann (hwiegmann@wc.com)
Andrew W. Rudge (arudge@wc.com)
Matthew V. Johnson (mjohnson@wc.com)
Jesse Smallwood (jsmallwood@wc.com)
Krista Anderson (kmanderson@wc.com)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
(202) 434-5000
(202) 434-5029 (fax)

Attorneys for Defendant HSBC Mortgage Corp. (USA)

/s/ John Doherty

John P. Doherty (john.doherty@alston.com)
Jennifer Susan Kozar
(jennifer.kozar@alston.com)
James S. D’Ambra, Jr.
(jamesdambra@alston.com)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
(212) 210-9400
(212) 210-9444 (fax)

Attorneys for Defendant SunTrust Mortgage, Inc.

/s/ Cameron S. Matheson

James A. Murphy (jmurphy@mmlawus.com)
Cameron S. Matheson (cmatheson@mmlawus.com)
Theodore R. Snyder (tsnyder@mmlawus.com)
MURPHY & MCGONIGLE, PC
1185 Avenue of the Americas
21st Floor
New York, NY 10036
(212) 880-9999

*Attorneys for Defendants Summit Financial Mortgage
LLC and Summit Community Bank, Inc.*

/s/ Robert A. Fumerton

Robert A. Fumerton (robert.fumerton@skadden.com)
Alexander C. Drylewski
(alexander.drylewski@skadden.com)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036
(212) 735-3000
(212) 735-2000 (fax)

Attorneys for Defendant UBS Real Estate Securities Inc.

/s/ Roland P. Reynolds

Roland P. Reynolds
(rreynolds@pdlawyers.com)
PALMER, LOMBARDI & DONOHUE, LLP
515 South Flower Street
Suite 2100
Los Angeles, CA 90071
(213) 688-0430
(213) 688-0440 (fax)

*Attorney for Defendant Mortgage Investors
Group, a general partnership*

CERTIFICATE OF SERVICE

I, Krista Anderson, hereby certify that this 3rd day of June 2015, I caused a true and correct copy of the foregoing Notice of Defendants' Motion to Modify Order Appointing Mediator to be served by the Court's electronic filing system upon:

Peter Calamari (petercalamari@quinnemanuel.com)
Anthony P. Alden (anthonyalden@quinnemanuel.com)
Jennifer A.L. Battle (battle@carpenterlipps.com)
Isaac Nesser (isaacnesser@quinnemanuel.com)
John Sullivan (johnsullivan@quinnemanuel.com)
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Ave.
New York, NY 10001

Attorneys for Plaintiff Rescap Liquidating Trust

/s/ Krista Anderson
Krista Anderson